



Planning Commission Report

Meeting Date: October 10, 2016

Subject: **9900 Wilshire Boulevard (One Beverly Hills) Zone Text Amendment, Vesting Tentative Tract Map and Development Plan Review, Development Agreement, and Final SEIR**
Request for amendments to the 9900 Wilshire Specific Plan and associated Vesting Tentative Tract Map, Development Plan Review, and Development Agreement to convert a portion of the previously approved project from condominiums and retail space into a luxury hotel with ancillary uses. The proposed project also includes rooftop amenities, open air dining areas, and a new motor court access from North Santa Monica Boulevard. Pursuant to the provisions set forth in the California Environmental Quality Act (CEQA), the Planning Commission will also consider a Final Supplemental Environmental Impact Report (Final SEIR).

Project Applicants: Wanda Beverly Hills Properties, LLC

Recommendation: That the Planning Commission:

1. Conduct a continued public hearing and receive additional testimony regarding the Project; and
2. Provide direction to staff and the applicant as appropriate.

REPORT SUMMARY

The Planning Commission previously discussed the project at Special Meetings on August 23, 2016, September 19, 2016, and September 26, 2016 and directed staff and the applicant to return with additional information. This report contains updated analysis on those items that were requested by the Planning Commission, and an independent analysis of information submitted by representatives of the Beverly Hilton Hotel. Staff seeks direction from the Planning Commission on the various entitlement requests. Information on the project background, neighborhood setting, project description, environmental assessment, requested entitlements, and General Plan considerations, as well as analysis of other pertinent issues, are contained in the September 26, September 19, and August 23, 2016 Staff Reports, which are included as Attachments C, D, and E, respectively, to this report.

Attachment(s):

- A. Required Findings
- B. Public Correspondence
- C. September 26, 2016 Planning Commission Staff Report (Without Attachments)
- D. September 19, 2016 Planning Commission Staff Report (Without Attachments)
- E. August 23, 2016 Planning Commission Staff Report (Without Attachments)
- F. May 12, 2016 Planning Commission Staff Report (Without Attachments)
- G. Revised Loading Dock Access Design (Submitted by Applicant)
- H. Supplemental Transportation Data following Sept. 26 Planning Commission Meeting for One Beverly Hills (Fehr & Peers)
- I. Response to Comment Letter from Ramboll Environ (Rincon Consultants)
- J. Montage Beverly Hills Hotel Loading Dock 12-Hour Count Data
- K. L'Ermitage Hotel Loading Dock 7-Day Count Data (updated)
- L. Draft Project Conditions (Redlined showing changes to existing conditions)

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PUBLIC OUTREACH

Public Comment. Correspondence was received from members of the public at previous Planning Commission meetings, and copies of this correspondence was distributed to the Planning Commission as part of prior staff reports.

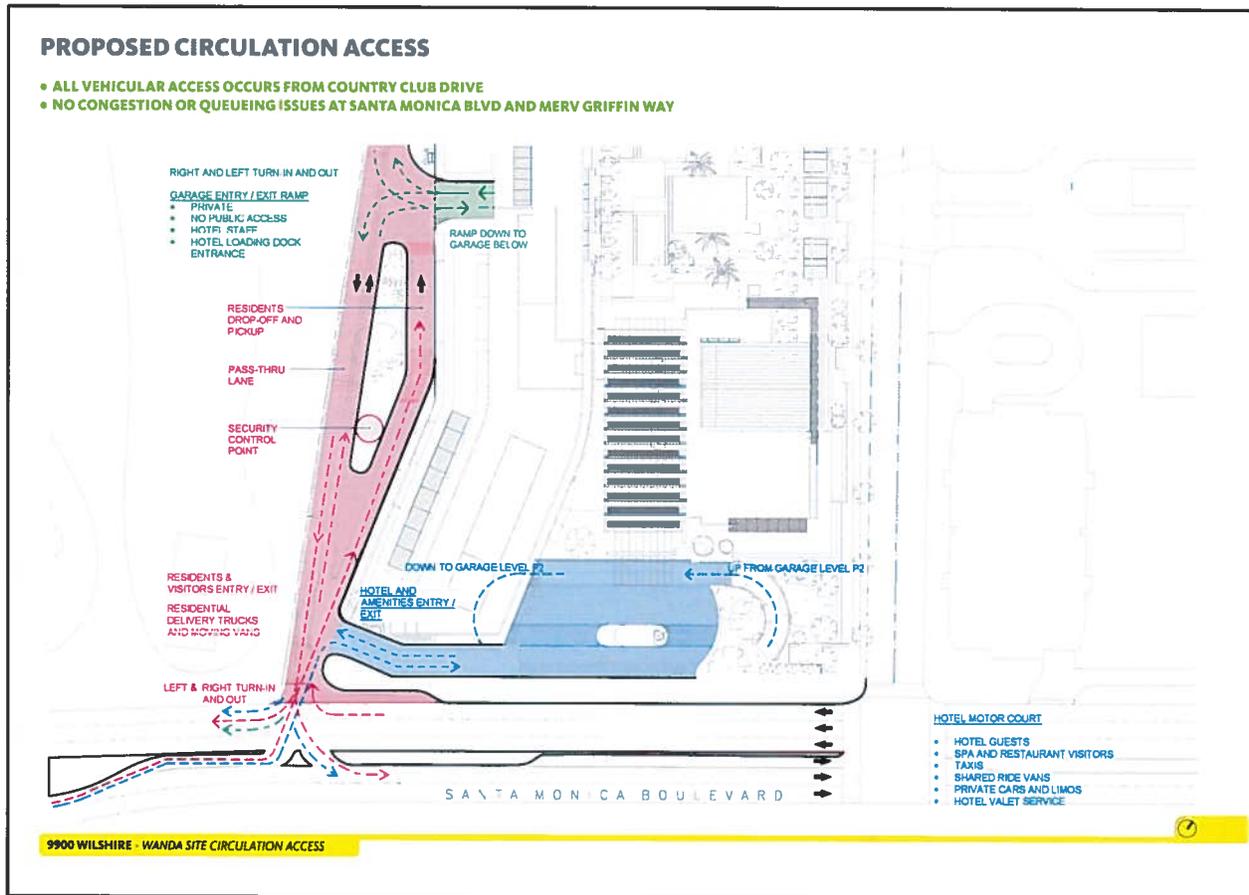
At the September 26, 2016 Planning Commission meeting, representatives of the Beverly Hilton Hotel indicated that they have prepared studies which include additional information and analysis on traffic, construction management, and loading activities for the Planning Commission to consider. The Planning Commission indicated that they would like to review any information that is available, and requested that these materials be submitted to City staff by September 28th so that staff would have adequate time to analyze and prepare an independent analysis of any new or additional information. The majority of these materials were received on September 28th, and two additional studies were submitted on September 29th. All of these materials, with the exception of video files, are included in Attachment B to this report.

ANALYSIS

Staff provided analysis in the September 26, September 19 and August 23, 2016 Planning Commission meeting staff reports (Attachments C, D, and E, respectively) regarding various issues for the Commission's consideration. During the course of the three meetings, the Planning Commission asked numerous questions and requested clarification or further information on certain topics. The prior staff reports contain summaries of the analysis provided at the Planning Commission meetings, and provide additional analysis. This report provides additional analysis of issues raised by representatives of the Beverly Hilton Hotel. Additional technical analysis has also been prepared by the City's independent consultants, and are included in Attachments H and I to this report.

In addition, attached to this staff report are draft Project conditions for the Commission's review and comment. The attached draft conditions are an updated version of the approved project's conditions incorporating staff recommendations for the revised project (Attachment L). Conditions that have proposed changes are highlighted in bold text in the attachment. As part of any direction to staff, the Commission may choose to review the language of the draft conditions, suggest additional or modified conditions, and direct staff to return to a future Planning Commission hearing with draft Planning Commission resolutions incorporating the conditions of approval.

Motor Court Access and Circulation. At the September 19, 2016 Planning Commission meeting, representatives of the Beverly Hilton Hotel proposed a new access scenario for the One Beverly Hills hotel motor court, as shown below:



This scenario contains the following design features:

- The Project's western access road that is planned to serve residential uses would also provide access to the Hotel Motor Court and loading dock.
- A single driveway connecting to the West Access Road would serve the Hotel Motor Court (no direct access would be provided from Merv Griffin Way or Santa Monica Boulevard).
- A traffic signal would be installed at the West Access Road & Santa Monica Boulevard intersection allowing left turns in and out of the Project site.
- The existing left-turn pocket at the West Access Road would be utilized by vehicles entering the Project site from eastbound Santa Monica Boulevard. A median would be installed between this left-turn pocket and the adjacent left-turn pocket at Merv Griffin Way.



- The traffic signal could also be utilized during construction to provide truck access to/from the Project site.

The City's independent traffic consultant, Fehr & Peers, has provided the following observations on this proposed motor court configuration (also included in Attachment H):

- The West Access Road & Santa Monica Boulevard intersection would not meet peak hour traffic volume warrants for the installation of a traffic signal. This is due to the number of vehicles utilizing the West Access Road during the peak hours (fewer than 100 vehicles per hour).
- The signalized intersection would be in very close proximity to the existing traffic signal at the Santa Monica Boulevard North & South crossover intersection located approximately 200 feet to the west and the planned traffic signal at Merv Griffin Way located approximately 400 feet to the east.
- The median placed between the existing left-turn pocket at the West Access Road and the adjacent left-turn pocket at Merv Griffin Way would reduce the amount of storage for vehicles turning from eastbound Santa Monica Boulevard onto Merv Griffin Way by approximately 100 feet.
- Without the installation of a traffic signal, vehicles could not exit the West Access Road to make a left turn onto eastbound Santa Monica Boulevard. Santa Monica Boulevard will be widened to three lanes in the westbound direction upon completion of the Project's and Beverly Hilton's mitigation measures. No other Project driveways, nor Beverly Hilton driveways, permit a left-turn movement across three lanes of adjacent street traffic.
- A temporary construction signal is not needed. During construction, a flagman would control truck turning movements in and out of the Project site. The flagman can stop vehicles for the minimum amount of time needed to allow a truck to turn in/out of the Project site to minimize delays to vehicles traveling along Santa Monica Boulevard to the extent possible.

Based on these observations, Fehr & Peers does not recommend implementing the proposed new access scenario for the hotel motor court. If the Planning Commission wishes to restrict access to the Hotel Motor Court, the following modifications to the Preferred Access Option are recommended by Fehr & Peers:

- Remove left-turn access directly from eastbound Santa Monica Boulevard to the Hotel Motor Court (or restrict left-turn access during afternoon peak hours, 4:00 to 7:00 PM).
- Restrict outbound access during the morning peak hours (7:00 to 9:00 AM) from the Hotel Motor Court onto Merv Griffin Way and implement "Keep Clear" signage and pavement markings to minimize the potential of southbound vehicles traveling



on Merv Griffin Way being blocked by vehicles exiting the Motor Court, and vice versa.

Noise Impacts. Representatives of the Beverly Hilton Hotel submitted a technical memorandum prepared by Ramboll Environ raising concerns with the noise analysis prepared for the Proposed Project. This memorandum generally raised the following issues:

- Existing sound levels were not appropriately accounted for in the Final SEIR, and additional measurements should have been taken on Wilshire Boulevard and Merv Griffin Way.
- Noise levels reported in the Beverly Hilton Revitalization Plan EIR are lower than the noise levels reported in the One Beverly Hills Final SEIR for similar locations, potentially because of the different times measurements were taken.
- Construction noise impacts are not adequately disclosed in the Final SEIR because impacts were assessed in CNEL rather than Leq.
- The nighttime construction noise impacts are not sufficiently analyzed because impacts should have been assessed based on a 24-hour measurement of existing ambient noise levels, and more stringent operational thresholds should be applied to nighttime construction noise impacts.
- Topical Response K discloses that vibration impacts would be significant and this impact would be more of a concern during nighttime hours.
- A fabric barrier would be unlikely to achieve a sound transmission coefficient (STC) of 30, and no details are provided regarding the sound barrier along Merv Griffin Way, such as height of source or receptors, to substantiate the effectiveness of Mitigation Measure N-1.
- The loading dock operational noise analysis should consider all delivery trips to the Proposed Project, not simply the difference in delivery trips between the Approved Project and the Proposed Project. Noise from trucks utilizing Merv Griffin Way should have been assessed, and noise impacts should not be assessed in CNEL. The loading dock noise should be added to operational noise sources to fully assess the Proposed Project's operational noise impacts.

The City's independent environmental consultant, Rincon, has prepared a technical memorandum specifically responding to each of the issues raised by Ramboll Environ on behalf of the Beverly Hilton Hotel. In summary, Rincon found that none of the issues raised result in any new significant noise impacts beyond what was studied and disclosed in the Final SEIR. The full memorandum prepared by Rincon is included as Attachment I to this report.

Loading. At prior Planning Commission meetings, Staff along with the City's independent environmental consultant Rincon and traffic consultant Fehr & Peers, provided analysis



regarding loading dock operations. The following provides updates to the analysis of issues relating to loading dock operations:

Turning Movements and Access. Staff provided a summary of the design changes made by the applicant in order to improve turning movements for trucks entering and exiting the loading dock area. The Planning Commission requested that staff independently verify that the turning movements depicted by the applicant are accurate. Staff independently reviewed the turning movements presented by the applicant and identified some minor design changes. Based on staff's recommended changes, the applicant has updated the loading dock entrance design to ensure the access point accommodates typical 40-foot articulated trailer trucks as well as 30-foot unarticulated box trucks. The revised loading dock design is provided as Attachment G to this report. While these types of trucks are able to maneuver into and out of the loading dock, it should be noted that the turning movements will require the trucks to use the entire width of the loading dock ramp, and upon exit, will require use of both southbound lanes on Merv Griffin Way in order to make a right turn out of the loading dock. In order to be more conservative, staff also tested the loading dock design for 50' articulated trailer trucks, as well as 40' unarticulated trucks (which are similar in size to typical tour buses), and both vehicle types were also found to be able to maneuver into and out of the loading dock, with the same caveats of requiring the entire width of the loading dock ramp and requiring both southbound lanes on Merv Griffin Way when exiting to the right to travel southbound.

Commissioners also requested information regarding any loading areas located along Merv Griffin Way related to the Beverly Hilton Hotel. Currently, there is a secondary loading dock located at the northern end of the Beverly Hilton property along Merv Griffin Way, adjacent to the existing hotel rooms that front on Merv Griffin Way. Under the Beverly Hilton Revitalization Plan approved in April 2008, site plans show what appears to be a turnout parallel to Merv Griffin Way, adjacent to the New Luxury Residence A building, in a similar location to the existing loading dock. This turnout could potentially be used for loading activities. In the site plans submitted as part of the Measure HH initiative, it appears that this loading turnout would be removed, and all loading areas would be accessed from Santa Monica Boulevard.

Loading Truck Trips. The applicant has provided estimates for the anticipated number of loading and garbage truck trips the Proposed Project would generate as compared to what the Approved Project would have generated. The table below shows this information.



**Proposed Project in Comparison to Approved Project:
 Estimated Delivery & Garbage Truck Trips for Site Operations**

Site Operations	Daily Truck Trips (6:00 AM - 2:30 PM)							
	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Weekly
Approved Project	4	6	4	3	6	1	0	24
Plus Garbage Trucks	1	0	1	1	1	1	0	5
Approved Project Total	5	6	5	4	7	2	0	29
One Beverly Hills	8	10	8	8	10	4	0	48
Plus Garbage Trucks	1	1	1	1	1	1	0	6
One Beverly Hills Total	9	11	9	9	11	5	0	54
Net Additional Truck Trips	4	4	4	5	4	3	0	24
Net Additional Total Truck Trips (with Garbage Trucks)	4	5	4	5	4	3	0	25

Source: Wanda Beverly Hills Properties, LLC

Concerns were raised by speakers at prior Planning Commission meetings, including representatives from the Beverly Hilton Hotel, that the actual number of loading trips for a hotel like One Beverly Hills would be higher than the applicant's estimates. In an effort to provide an independent assessment of typical loading operations for luxury hotels in Beverly Hills, staff collected data from the Montage Beverly Hills Hotel (201 rooms) and the L'Ermitage Hotel (116 rooms).

Staff conducted a 12-hour on-site count of loading truck trips at the Montage Beverly Hills Hotel on Thursday, September 21, 2016 from 6:00am – 6:00pm. The entry access to the Montage Beverly Hills hotel is provided via a one-way alley accessed from Wilshire Boulevard. In addition to the Montage, this alley also provides access to the loading area for the Ervin Cohen and Jessup office building (9401 Wilshire) and the California Bank Building (9441 Wilshire Boulevard). Because it is a one-way alley, all trucks delivering or loading to all three buildings exit from the Montage loading dock exit. In order to ensure that only those loading trips that are associated with the Montage are counted, staff members were positioned inside the loading dock itself, and counted only those vehicles that performed deliveries at the



Montage, and did not count any vehicles that stopped at the other office buildings' loading areas or were passing through without making any stops. Loading vehicle types included box trucks, step vans, FedEx/UPS and other parcel delivery trucks, and garbage trucks. No tractor trailers were observed during this 12-hour period. A summary of these counts is provided in the table below, and the raw data is included as Attachment J of this report.

**Montage Beverly Hills Loading Area Counts
September 21, 2016**

Hour	Box Truck/ Step Van	Parcel Delivery Truck	Garbage Truck	Tractor Trailer
6:00 – 7:00 AM	4			
7:00 – 8:00 AM	2			
8:00 – 9:00 AM				
9:00 – 10:00 AM	4	1	1	
10:00 – 11:00 AM	2	2		
11:00 – 12:00 PM	3	1		
12:00 – 1:00 PM	3		1	
1:00 – 2:00 PM	1	1		
2:00 – 3:00 PM	2	1		
3:00 – 4:00 PM	1	2		
4:00 – 5:00 PM				
5:00 – 6:00 PM				
Totals:	22	8	2	0

It should be noted that these counts represent a single day's operations, and it is not possible to determine if this data is representative of typical daily operations at the Montage Beverly Hills Hotel. Furthermore, there are a few distinctions between the Montage Beverly Hills Hotel and the proposed One Beverly Hills Hotel. The Montage Beverly Hills Hotel has a single loading dock for both the hotel/food/beverage facilities, and the residential units on the site. It is likely that a majority of the parcel delivery truck trips were deliveries being made to the residents of the Montage. The proposed One Beverly Hills Hotel would have a separate loading area for residential loading purposes, including parcel deliveries. Additionally, any parcel deliveries being made to the One Beverly Hills Hotel would likely utilize the motor court, since it is closer to the main hotel entrance than the loading dock, and the One Beverly Hills motor court would be larger than the Montage Beverly Hills motor court, making it easier for parcel delivery trucks to temporarily stage while making deliveries.

Since the last Planning Commission meeting on September 26, 2016, staff reviewed additional video footage of the loading dock area at the L'Ermitage Hotel to obtain a complete



one-week period loading area count, starting on Monday, September 12, 2016 through Sunday, September 18, 2016. Any delivery vehicles that stopped at the loading dock to load or unload materials were counted, and truck types included box trucks, step vans, FedEx/UPS and other parcel delivery trucks, garbage trucks, and tractor trailers. An updated summary of these counts is provided in the table below, and the updated raw data is included as Attachment K of this report.

**L'Ermitage Hotel Loading Area Counts
September 12 through 18, 2016**

Day	Box Truck/ Step Van	Parcel Delivery Truck	Garbage Truck	Tractor Trailer	Daily Total
Monday (9/12/16)	7	2	1		10
Tuesday (9/13/16)	11	1	1		13
Wednesday (9/14/16)	10	1	1	1	13
Thursday (9/15/16)	24	1	1		26
Friday (9/16/16)	8	1	1		10
Saturday (9/17/16)	4	1	1		6
Sunday (9/18/16)	3				3
Weekly Total	67	7	6	1	81

This data has been updated to represent typical operations over a seven-day period at the L'Ermitage Hotel. It should be noted that during this particular week, events were held on the rooftop event venue on Friday 9/16/16 and Saturday 9/17/16 for the Emmy awards. This is the primary cause for the higher number of loading activities occurring on Thursday, 9/15/16, as event setup was taking place and vendors were setting up booths. Similar to the Montage Beverly Hills Hotel, the L'Ermitage has a single loading area located at the rear of the property and accessed via the alley. However, the L'Ermitage Hotel does not include any residences, and thus the number of parcel deliveries would be more in line with what is typical of a hotel-only operation.

Simultaneous Events. Staff and the City's independent traffic consultant presented a peer review of the applicant-prepared simultaneous event study, and concluded that the study analyzed the transportation impacts of a 1,000-guest weeknight event at the Beverly Hilton and a 285 guest weeknight event at One Beverly Hills. The study was found to be based on standard methodologies and prepared in accordance with the typical procedures applied to traffic studies in Beverly Hills, and Fehr and Peers concurred with the analysis results, which concluded that there would be no significant impact to the 11 study intersections under the 2020 Cumulative scenario.

Concerns were raised by the Planning Commission and representatives of the Beverly Hilton Hotel that the 1,000-guest assumption for an at-capacity scenario at the Beverly Hilton was not sufficient, and that the Beverly Hilton regularly accommodates events with higher



capacities. At the September 19th meeting, staff and the applicant team were directed to re-analyze the simultaneous event scenario taking into account a 2,000-guest assumption. This analysis has been completed, and the following provides a summary of the findings:

- Twice as many vehicle-trips would be generated by the 2,000-guest event when compared to the original study of a 1,000-guest event at the Beverly Hilton. Applying the observed Hilton event rate yields 570 vehicle trips (in comparison to 285 vehicle trips in the original study) for the 2,000-person event at the Hilton)
- Similar to the original study, a special event at One Beverly Hills would generate an additional 80 vehicle trips, consisting of 60 inbound trips and 20 outbound trips, during the peak hour before an event.
- Traffic impact studies examine the increment of change that will occur with the development of a potential project. Therefore, similar to the original event study, the updated study first assigned vehicle-trips generated by the Beverly Hilton event to future baseline conditions to develop "Future plus Beverly Hilton Event" traffic forecasts and Level of Service (LOS) results. Next, the additional vehicle trips generated by One Beverly Hills (typical operations plus special event) were added to generate "Future plus Beverly Hilton & One Beverly Hills Event" traffic forecasts and LOS results.
- Similar to the original study, when comparing traffic operations under Future plus Beverly Hilton & One Beverly Hills Event conditions to conditions with only the event at the Beverly Hilton, the increment of change in the Vehicle to Capacity ratios at the study intersections does not exceed the City's significance thresholds.

In summary, the One Beverly Hills project generates 80 total trips during special events. The Beverly Hilton would generate 235 trips during a 1,000-person event, and 570 trips during a 2,000-person event. The Fehr & Peers' peer review of the applicant's updated simultaneous event study has confirmed that the trips generated by a special event at One Beverly Hills, in addition to a 2,000-person event at the Beverly Hilton, would not exceed the City's adopted significance thresholds at the study intersections under the 2020 Cumulative conditions.

SUMMARY AND RECOMMENDATION

The analysis provided above, as well as the attached technical studies, provide information in response to several questions and concerns raised by the Planning Commission and members of the public with regard to motor court access, loading activities, and construction management. Staff has also provided a recommended set of project conditions that could apply to the Proposed Project. Based on the analysis provided in previous staff reports, the Final SEIR, and issue-specific technical memos and diagrams, staff recommends that the Planning Commission consider these issues, as well as any other issues relating to the Proposed Project, and should the Commission reach consensus regarding project design and conditions, direct staff to return with resolutions memorializing the Planning Commission's findings regarding the Final SEIR and the requested entitlements.



NEXT STEPS

It is recommended that the Planning Commission continue holding the public hearing and receive testimony on the project, and direct staff as appropriate with respect to any project modifications, requests for information, or preparation of resolutions memorializing the Commission's deliberations and findings.

Report Reviewed By:

A handwritten signature in blue ink, appearing to read "Ryan Gohlich", written over a horizontal line.

Ryan Gohlich, AICP, Assistant Director of
Community Development / City Planner



Attachment A
Required Findings

Specific Plan Amendment

1. In considering the application for a Zone Text amendment, the Planning Commission shall consider whether the Zone Text Amendment will result in a benefit to the public interest, health, safety, morals, peace, comfort, convenience, or general welfare.
2. That the proposed Specific Plan Amendment is consistent with the General Plan.

Vesting Tentative Tract Map

1. Whether the proposed vesting tentative tract map and design or improvement of the proposed subdivision are consistent with the General Plan and applicable specific plans of the City;
2. Whether the site is physically suitable for the type of development and the proposed density;
3. Whether the design of the subdivision and the proposed improvements are likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat; and
4. Whether the design of the subdivision or type of improvements is not likely to cause serious public health problems; and
5. Whether the design of the subdivision or type of improvement is likely to cause serious public health problems and whether the design of the subdivision or the type of improvement will conflict with any public easements.

Development Plan Review:

1. The proposed plan is consistent with the General Plan and any specific plans adopted for the area;
2. The proposed plan will not adversely affect existing and anticipated development in the vicinity and will promote harmonious development of the area;
3. The nature, configuration, location, density, height and manner of operation of any commercial development proposed by the plan will not significantly and adversely interfere with the use and enjoyment of residential properties in the vicinity of the subject property;



4. The proposed plan will not create any significantly adverse traffic impacts, traffic safety hazards, pedestrian-vehicle conflicts, or pedestrian safety hazards; and
5. The proposed plan will not be detrimental to the public health, safety, or general welfare.

Development Agreement

1. Whether the provisions of the Development Agreement are consistent with the General Plan and comply with its objectives and policies.

Final Supplemental Environmental Impact Report (Final SEIR)

1. Certification of the Final SEIR
 - a. The Final SEIR has been completed in compliance with CEQA;
 - b. The Final SEIR was presented to the decision-making body of the lead agency and that the decision-making body reviewed and considered the information contained in the Final SEIR prior to approving the project; and
 - c. The Final SEIR reflects the lead agency's independent judgment and analysis
2. Findings for each identified significant environmental effect of the project:
 - a. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final SEIR; or,
 - b. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency; or,
 - c. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final SEIR.
3. Finding that the lead agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if any of the following conditions would require the preparation of a subsequent EIR and only minor additions or changes would be necessary to make the previous EIR adequate for the project as revised:
 - a. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
 - b. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or



- c. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - i. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - ii. Significant effects previously examined will be substantially more severe than shown in the previous EIR
 - iii. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternative; or
 - iv. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one of more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative
4. Statement of Overriding Considerations:
 - a. Whether adverse environmental effects may be considered "acceptable" because the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects.
5. Findings relating to feasibility of project alternatives and mitigation measures, as appropriate